

May 30, 2019

To,
Listing Department,
BSE Limited,
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001

BSE Scrip Code: 500824

SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT PURSUANT TO SEBI CIRCULAR NO. CIR/CFD/CMD1/27/2019

Dear Sir(s),

Pursuant to the provisions of the SEBI Circular No. CIR/CFD/CMD1/27/2019, please find enclosed Annual Secretarial Compliance Report dated May 22, 2019 issued by SSPK & Co., Company Secretaries for the Financial Year ended March 31, 2019.

This is for your kind information and records.

Yours faithfully
For Lords Chloro Alkali Limited


Anish Kumar
Company Secretary

SSPK & CO.

COMPANY SECRETARIES

308, 3rd Floor, S G Shopping Mall, D C Chowk, Sector – 9, Rohini, Delhi – 110085
Ph. 9717239485, 8527472421, 011 45012969; Email: s2scorporatelegal@gmail.com

Secretarial Compliance Report

of LORDS CHLORO ALKALI LIMITED for the year ended
31st March, 2019

I/We have examined:

- (a) all the documents and records made available to us and explanation provided by Lords Chloro Alkali Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2019 ("Review Period") in respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, wherever applicable, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



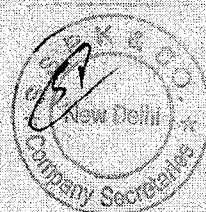
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (I) The Depositories Act, 1996;
- (J) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003;
- (K) other Act, Regulations, rules and guidelines, as amended from time to time, issued thereunder by the Securities and Exchange Board of India applicable to the Company and circulars/ guidelines issued thereunder;

and based on the above examination, I/We hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

S. NO.	COMPLIANCE REQUIREMENT (REGULATIONS/ CIRCULAR/ GUIDELINES INCLUDING SPECIFIC CLAUSE)	DEVIATIONS	OBSERVATIONS/ REMARKS OF THE PRACTICING COMPANY SECRETARY (PCS)
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.



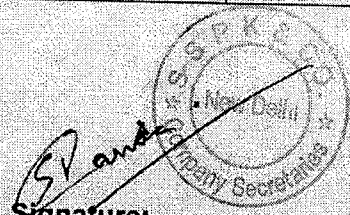
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
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- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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Place: Delhi
Date: 22.05.2019


 Signature:
 Sanjeev Pandey
 Partner
 SSPK & CO.
 Company Secretaries
 ACS No.: 33468
 C P No.: 17237